

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT FOR THE  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

MDL No. 3:16-md-2738-MAS-LHG

JUDGE MICHAEL A. SHIPP  
MAG. JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

Civil Case No. 3:20-cv-03797-MAS-LHG

**DIANA LYNN LIPTON** v. JOHNSON &  
JOHNSON, et al.

**DECLARATION OF LINDA MOXON AS CO-SUCCESSOR-IN-INTEREST  
PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE SECTION  
377.32**

I, Linda Moxon, declare as follows:

1. The decedent in this matter is Diana Lynn Lipton. She was my sister.
2. Diana Lynn Lipton died of ovarian cancer on December 8, 2022, in Santa Rosa, California.
3. A true and correct copy of the death certificate, with social security number redacted, is attached as Exhibit A to the instant Motion to Substitute Party-Plaintiff.
4. “No proceeding is now pending in California for administration of the decedent’s estate.”

5. I am one of the decedent's successors-in-interest (as defined by section 377.11 of the California Code of Civil Procedure) and a co-successor, along with my siblings Evelyn Willner, Heidi Moxon Morishita, and Bennett Moxon, to the decedent's interest in this action.
6. No other person has a superior right to commence the action or proceeding or to be substituted for the decedent in the pending action or proceeding.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in  
Pacific Palisades \_\_\_\_\_, California on the date specified below.

Dated: August 24, 2023

Linda Moxon

Linda Moxon (Aug 24, 2023 13:55 PDT)

Linda Moxon

# CCP 377.32 Declaration of Linda Moxon

Final Audit Report

2023-08-24

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## "CCP 377.32 Declaration of Linda Moxon" History

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 Signer voxmox@gmail.com entered name at signing as Linda Moxon

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 Document e-signed by Linda Moxon (voxmox@gmail.com)

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